

BHSS 6.9.1.2



Steven_Hughes@urscorp.com

10/26/2001 02:59 PM

To: jstefano@ch2m.com

cc: Marykay Voytilla/R10/USEPA/US@EPA, Maryjane Nearman/R10/USEPA/US@EPA

Subject: Added response to BHSS CTP Comment 1-7

Attached is Chuck's addition to the comment response.

Steven P. Hughes, PG
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----- Forwarded by Steven Hughes/Seattle/URSCorp on 10/26/01 02:55 PM -----

Chuck Vita

Hughes/Seattle/URSCorp@URSCORP
10/26/01
12:16 PM

CTP Comment

To: Steven

cc:

Subject: Added response to BHSS
1-7

My additions are noted in red in the attached.

(See attached file: BHSS CTP Comment 1-7.doc)

Chuck Vita, PhD, PE, GE
URS, Century Square
1501 4th Ave. Suite 1400
Seattle, WA 98101 - 1616
Tel: 206.438.2348
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----- Forwarded by Chuck Vita/Seattle/URSCorp on 10/26/01 12:13 PM -----

"Stefanoff,
Jim/SPK"
<jstefano@ch2
m.com>

comments

To: Chuck_Vita@urscorp.com

cc:

Subject: RE: e version of CTP

10/19/01
11:00 AM



SEND TO CHUCK VITA TO ADD TO...Upper basin remedial actions are in the planning stage, and their effectiveness cannot be assessed yet. The effluent

quality for the CTP presented in the RI/FS is in the actual discharge, not in the stream. The CTP discharges into Bunker Creek, which is often dry upstream of the discharge location. The anticipated CTP effluent quality is sufficient to meet the CTP TMDL allocation as identified in the August 2000 document and the State and federal water quality criteria-it does not usurp the CTP waste load allocation. The CTP waste load allocation is only for the

CTP, it does not include contingency if upstream waste load allocations are not met. Further reduction in CTP discharge metal load will likely not make a significant difference compared to potential upstream loads.

-----Original Message-----

From: Chuck_Vita@urscorp.com [mailto:Chuck_Vita@urscorp.com]

Sent: October 19, 2001 9:47 AM

To: Stefanoff, Jim/SPK

Subject: RE: e version of CTP comments

Thanks, Jim. Could I also get your current response?

"Stefanoff,

Jim/SPK"

To: Chuck_Vita@urscorp.com

<jstefano@ch2

cc:

m.com>

Subject: RE: e version of CTP

comments

10/19/01

09:29 AM

Hi Chuck, here is the text of Comment 1.7:

"Remedies" for numerous OU4-wide locations that are ineffective or partially effective are contemplated in the probabilistic loading model developed for OU4. Subsequently, this model is used to estimate probabilities of achieving

the TMDL (or more recently multiples of the TMDL) at specific locations in the Basin at specified durations from initiation of each remedy. Effluent qualities estimated for the CTP appear to be in-stream loads. This means that the design effluent criteria for the CTP essentially usurps the waste load allocation for the entire South Fork at its confluence with Bunker Hill

Creek. To make matters worse, it also appears that waste loads from upstream

sources that have fallen short of their remedial goals due to ineffective remediation have not been considered. Please clarify.

-----Original Message-----

From: Chuck_Vita@urscorp.com [mailto:Chuck_Vita@urscorp.com]

Sent: October 18, 2001 5:12 PM

To: Stefanoff, Jim/SPK

Subject: e version of CTP comments

Jim, could you please send me an e version of the comments, or at least
"my" comment. thanks, chuck

Chuck Vita, PhD, PE, GE
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Seattle, WA 98101 - 1616
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BHSS CTP Comment

CTP Comment 1.7:

"Remedies" for numerous OU4-wide locations that are ineffective or partially effective are contemplated in the probabilistic loading model developed for OU4. Subsequently, this model is used to estimate probabilities of achieving the TMDL (or more recently multiples of the TMDL) at specific locations in the Basin at specified durations from initiation of each remedy. Effluent qualities estimated for the CTP appear to be in-stream loads. This means that the design effluent criteria for the CTP essentially usurps the waste load allocation for the entire South Fork at its confluence with Bunker Hill Creek. To make matters worse, it also appears that waste loads from upstream sources that have fallen short of their remedial goals due to ineffective remediation have not been considered. Please clarify.

CTP Comment 1-7 Response (CLV additions/modifications in red):

The probabilistic estimates for OU 4 are documented in the Coeur d'Alene Basin RI/FS Technical Memorandum "*Probabilistic Analysis of Post-Remediation Metal Loadings*" Revision 1, dated September 2001. As explained in Section 1.2 of that document, the analysis, in its current form, does not explicitly include loadings from the BHSS (except in a "parametric" sense, as further explained in Section 3.4). This means that the estimates for OU 4 loadings and remedial actions have been de-coupled from the BHSS and are thus not influenced by loadings from the CTP. Please refer to the technical memorandum for a complete explanation of the analysis.

With respect to the CTP, the effluent quality presented in the RI/FS is in the actual discharge, not in the stream. The CTP discharges into Bunker Creek, which is often dry upstream of the discharge location. The anticipated CTP effluent quality is sufficient to meet the CTP TMDL allocation as identified in the August 2000 document and the State and federal water quality criteria--it does not usurp the CTP waste load allocation. The CTP waste load allocation is only for the CTP, it does not include contingency if upstream waste load allocations are not met. Further reduction in CTP discharge metal load will likely not make a significant difference compared to potential upstream loads.